

# Exhibit B

*to June 3, 2020 Reply Letter*

**From:** [Denton, David \(USANYS\)](#)  
**To:** [Lake, Stephanie \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#); [Kim, Jane \(USANYS\)](#) 4  
**Subject:** FW: OFAC Witness Help - SDNY Nejad Prosecution  
**Date:** Friday, January 3, 2020 3:00:10 PM

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**From:** Samantha.Sultoon@treasury.gov <Samantha.Sultoon@treasury.gov>  
**Sent:** Friday, January 3, 2020 2:57 PM  
**To:** Denton, David (USANYS) <DDenton@usa.doj.gov>  
**Cc:** MariaHelene.VanWagenberg@treasury.gov  
**Subject:** RE: OFAC Witness Help - SDNY Nejad Prosecution

David –

My colleagues had been in touch with you regarding your request to have an OFAC witness testify on various regulations in the prosecution of Hashemi Nejad. I understand that the trial has been delayed. As we have had some personnel changes, I wanted to check with you regarding the schedule for the trial before reassigning staff to assist. Also, can you kindly confirm the anticipated location of the trial?

Thank you,  
Samantha

*Samantha Sultoon*  
Section Chief, Enforcement  
Office of Foreign Assets Control (OFAC)  
U.S. Department of the Treasury  
[Samantha.Sultoon@treasury.gov](mailto:Samantha.Sultoon@treasury.gov)

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**From:** Denton, David (USANYS) <[David.Denton@usdoj.gov](mailto:David.Denton@usdoj.gov)>  
**Sent:** Thursday, July 18, 2019 10:18 AM  
**To:** Malec, Julie <[Julie.Malec@treasury.gov](mailto:Julie.Malec@treasury.gov)>  
**Cc:** [David.Denton@usdoj.gov](mailto:David.Denton@usdoj.gov) <'David.Denton@usdoj.gov'>; Van Wagenberg, Maria-Helene <[MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov)>  
**Subject:** Re: OFAC Witness Help - SDNY Nejad Prosecution

Sure. The trial is scheduled to start October 21, and while I can't be that precise, I think it's safe to say that the OFAC witness will be on in the first week. Happy to jump on a call today or tomorrow if it would help to just explain a little more of the lay of the land.

David W. Denton, Jr.  
Assistant U.S. Attorney

Southern District of New York  
(212) 637-2744

On Jul 18, 2019, at 10:15 AM, "[Julie.Malec@treasury.gov](mailto:Julie.Malec@treasury.gov)" <[Julie.Malec@treasury.gov](mailto:Julie.Malec@treasury.gov)> wrote:

David

Do you have any rough estimate of a timeline for testimony on this matter?

Julie M. Malec  
Acting Assistant Director for Enforcement  
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[Julie.Malec@treasury.gov](mailto:Julie.Malec@treasury.gov) (unclassified)  
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[malecj@treasury.ic.gov](mailto:malecj@treasury.ic.gov) (JWICS)

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**From:** Van Wagenberg, Maria-Helene <[MariaHelene.VanWagenberg@treasury.gov](mailto:MariaHelene.VanWagenberg@treasury.gov)>  
**Sent:** Wednesday, July 17, 2019 3:12 PM  
**To:** Malec, Julie <[Julie.Malec@treasury.gov](mailto:Julie.Malec@treasury.gov)>; Miremadi, Kaveh <[Kaveh.Miremadi@treasury.gov](mailto:Kaveh.Miremadi@treasury.gov)>; Wells, Rosanna <[Rosanna.Wells@treasury.gov](mailto:Rosanna.Wells@treasury.gov)>  
**Cc:** <[David.Denton@usdoj.gov](mailto:David.Denton@usdoj.gov)>  
**Subject:** OFAC Witness Help - SDNY Nejad Prosecution

Hi Julie, Kaveh, and Rosie,

I'm putting you in touch with Dave Denton, an AUSA in the SDNY (copied here), who has asked about a potential OFAC witness for their prosecution of Ali Sadr Hashemi Nejad for sanctions violations: <https://www.justice.gov/opa/pr/iranian-national-arrested-scheme-evade-us-economic-sanctions-illicitly-sending-more-115>. I think SDNY will be asking ENF to run a license check on the various entities and people involved (SDNY had previously been in touch with Mike Dondarski and confirmed that there were no licenses in place, but still needs to obtain a formal license check), as well as for an OFAC witness to testify on the various regulations. I'll let Dave follow up with you on the specifics, but please feel free to keep us looped in to the extent our legal authorities are involved. Thanks all!

Best regards,  
Maria

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